

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

HAYWARD INDUSTRIES, INC.,

Plaintiff

v.

BLUEWORKS CORPORATION,
BLUEWORKS INNOVATION
CORPORATION, NINGBO C.F.
ELECTRONIC TECH CO., LTD; NINGBO
YISHANG IMPORT AND EXPORT CO.,
LTD.

Defendants.

Civil Action No. 3:20-CV-710 -MOC-SCR

SUGGESTION OF BANKRUPTCY

Defendant Blueworks Corporation (“Blueworks”) hereby notifies the Court and Plaintiff Hayward Industries, Inc. (“Hayward”) that on June 11, 2024, Blueworks filed a Chapter 11 Bankruptcy petition for relief under Title 11, United States Code, in the United States Bankruptcy Court for the Western District of North Carolina (the “Bankruptcy Court”), which bears the case number 24-30494. Pursuant to 11 U.S.C. § 362, an automatic stay goes into effect upon the filing of the petition with the Bankruptcy Court, which prohibits any and all efforts to collect a debt or seek to impose a charge on the property of Blueworks. Blueworks submits that any action against it has been stayed by operation of 11 U.S.C. § 362.

This the 11 day of June 2024.

Respectfully submitted,

/s/ Samuel Alexander Long, Jr.

Samuel Alexander Long, Jr.

NC Bar No. 46588

Christina Davidson Trimmer

NC Bar No. 44857

SHUMAKER, LOOP & KENDRICK, LLP
101 South Tryon Street
Suite 2200
Charlotte, North Carolina 28280
Tel: (704) 375-0057
Fax: (704) 332-1197
Email: along@shumaker.com
ctrimmer@shumaker.com

Michelle C. Dunn
Platinum Intellectual Property
3031 Tisch Way, Suite 110 PW
San Jose, CA 95128
Tel: 404-800-5884
Fax: 877-463-0654
Email: michelle.dunn@platinum-ip.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on June 11, 2024, the foregoing document was served on all counsel of record using the Court's CM/ECF system, which will send notification of such filing to any CM/ECF participants.

Respectfully submitted,

/s/ Samuel Alexander Long, Jr.

Samuel Alexander Long, Jr.

NC Bar No. 46588

SHUMAKER, LOOP & KENDRICK, LLP

101 South Tryon Street

Suite 2200

Charlotte, North Carolina 28280

Tel: (704) 375-0057

Fax: (704) 332-1197

Email: along@shumaker.com